

1 KEKER & VAN NEST LLP
2 ROBERT A. VAN NEST - # 84065
3 BRIAN L. FERRALL - # 160847
4 DAVID SILBERT - # 173128
5 MICHAEL S. KWUN - #198945
6 633 Battery Street
7 San Francisco, CA 94111-1809
8 Telephone: (415) 391-5400
9 Email: rvannest@kvn.com;
10 bferrall@kvn.com; dsilbert@kvn.com;
11 mkwun@kvn.com

SUSAN CREIGHTON, SBN 135528
SCOTT A. SHER, SBN 190053
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
1700 K Street NW, Fifth Floor
Washington, D.C., 20006-3817
Telephone: (202) 973-8800
Email: screighton@wsgr.com;
ssher@wsgr.com

1 JONATHAN M. JACOBSON, NY SBN 1350495
2 CHUL PAK (*pro hac vice*)
3 DAVID H. REICHENBERG (*pro hac vice*)
4 WILSON SONSINI GOODRICH & ROSATI
5 Professional Corporation
6 1301 Avenue Of The Americas, 40th Floor
7 New York, NY 10019-6022
8 Telephone: (212) 999-5800
9 Email: jjacobson@wsgr.com; cpak@wsgr.com;
10 dreichenberg@wsgr.com

11 Attorneys for Defendant ARISTA NETWORKS, INC.

12
13 UNITED STATES DISTRICT COURT
14
15 NORTHERN DISTRICT OF CALIFORNIA
16
17 SAN JOSE DIVISION

18 CISCO SYSTEMS, INC.,

19 Case No. 5:14-cv-05344-BLF (NC)

Plaintiff,

20 v.
21 **ARISTA NETWORKS, INC.'S
22 DEPOSITION DESIGNATIONS
23 (SUPPLEMENTAL KAVASSERI
24 DESIGNATIONS)**

Defendant.

Judge: Hon. Beth Labson Freeman

Date Filed: December 5, 2014

Trial Date: November 21, 2016

1 Pursuant to Judge Freeman's Jury Pretrial Standing Order, Arista Networks, Inc.
 2 ("Arista") hereby discloses the following supplemental deposition designations for Ram
 3 Kavasseri, attached hereto as Attachment A. Arista makes these supplemental designations to
 4 incorporate certain of Cisco's initial designations and counter-designations, in the event Cisco
 5 decides to withdraw them. Cisco's Arista's initial designations are based on the arguments it
 6 expects to make in support of its affirmative defenses as well as its understanding of the evidence
 7 that Cisco is likely to present and the arguments that Cisco is likely to make. To the extent that
 8 Cisco intends or attempts to rely on evidence and/or to make different or additional arguments
 9 from those timely disclosed by Cisco, Arista reserves the right to supplement or amend its
 10 depositions designations. Additionally, Arista's initial designations are based on the current status
 11 of the case. Arista reserves the right to supplement or amend its designations in light of any
 12 future rulings by the Court or any motions *in limine* or other evidentiary objections raised by the
 13 parties prior to trial.

14 Arista's initial designations do not constitute or reflect any commitment that Arista will
 15 present deposition testimony at trial from any particular witness or that it will present the entirety
 16 of its initial designations for any witness. Arista's initial designations also do not constitute or
 17 reflect a waiver of any evidentiary objection or an admission by Arista that any particular
 18 testimony by any witness should be permitted at trial.

19 Dated: November 23, 2016

KEKER & VAN NEST LLP

22 By: /s/ Robert A. Van Nest
 23 ROBERT A. VAN NEST

24 Attorneys for Defendant
 25 ARISTA NETWORKS, INC.

RAM KAVASSERI February 23, 2016					
Arista Designation	Cisco Objection	Cisco Counter-Designation	Arista Objections	Arista Counter-Counter Designations	Cisco Objections
10:16 - 10:19					
11:9 - 11:12					
12:24 - 13:2					
39:13-18					
39:25-40:4					
40:11-40:18					
41:5-41:9					
41:19-41:22					
46:5 - 46:10		47:22-48:5			
46:25 - 47:4		47:22-48:5			
47:8 - 47:10		47:22-48:5			
47:22 - 48:5		47:22-48:5			
48:11 - 49:17		47:22-48:5			
62:18 - 62:24		63:9-18	ERR; IMPROPER COUNTER; IRR; 403		
71:6 - 71:10	beyond scope of designations	71:11-13			
90:14 - 90:17					
102:1 - 102:5		102:6-19	IRR; 403		
102:24 - 103:3		102:6-19	IRR; 403		
103:8 - 103:11		102:6-19	IRR; 403		
106:3 - 106:7	602, speculation	106:14-107:7	IMPROPER COUNTER; IRR; 403		
106:25 - 107:11	speculation	106:14-107:7	IMPROPER COUNTER; IRR; 403		
107:15 - 108:21	speculation	106:14-107:7	IMPROPER COUNTER;		

			IRR; 403	
108:22 - 109:9	speculation	109:13-24		
109:25 - 110:5		109:13-24		
110:18 - 111:8		111:9-112:11		
112:12 - 113:1	Ambiguous, speculation, 602	113:2-5		
146:1 - 146:9		146:10-16	F	
146:17 - 147:11		146:10-16	IMPROPER COUNTER; F	
149:9 - 149:23		150:6-13	IMPROPER COUNTER	
150:25 - 151:16		150:6-13	IMPROPER COUNTER	
151:20 - 152:17		150:6-13	IMPROPER COUNTER	
153:10 - 153:12	Not testimony			
154:4 - 154:12	Speculation, 602			
154:18 - 154:24	Speculation, 602			
158:5 - 158:14				
158:15 - 159:12				
167:20 - 167:23		167:24-168:11	IMPROPER COUNTER	
170:18 - 171:25		170:14-19		
179:6 - 179:14	Speculation, 602			